

Message

From: Burke, NadiaHollan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9FF053AAF74C4A17A574A2A9A8C8B70D-NHOLLAN]
Sent: 1/5/2015 4:59:36 PM
To: Frank Vera [Ex. 6 Personal Privacy (PP)]
Subject: RE: George AFB Family Housing - pesticides "solid waste" under RCRA Section 1004(27)
Attachments: AR2311 EPA concur DF FOST C-17 etc.pdf

Here's another FOST letter, signed by Claire Trombadore who was acting on behalf of Michael Montgomery (actings are assigned if the delegated person is unavailable). Claire was the section chief (supervisor) for James Chang at the time. Now Claire's position is currently being held by Loren Henning, and Michael's position is being held by Angeles Herrera. As you know, I was the RPM assigned George AFB several months after James retired. Note the concerns in this letter regarding the petroleum spill. This is also being managed by the Water Board.

Nadia Hollan Burke, Environmental Engineer
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Phone: 415-972-3187 Fax: 415-947-3526
E-mail: Burke.NadiaHollan@epa.gov

From: Burke, NadiaHollan
Sent: Monday, January 05, 2015 8:41 AM
To: 'Frank Vera '
Subject: RE: George AFB Family Housing - pesticides "solid waste" under RCRA Section 1004(27)

The delegation for signing FOSTS is elevated to management level so can't be signed by the RPM (James Chang). It was signed by EPA including the objections to the AF position, so the FOST still contains the language regarding the EPA objection, that's what I referred you to earlier—it's very clear EPA did not concur with the AF position.

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From: Frank Vera [Ex. 6 Personal Privacy (PP)]
Sent: Friday, January 02, 2015 8:31 PM
To: Burke, NadiaHollan
Subject: RE: George AFB Family Housing - pesticides "solid waste" under RCRA Section 1004(27)

FOST - James Chang
James Chang EPA objects to the AF position on the pesticides
On page 62 and 63 of the FOST
James Chang, U.S. EPA, Region IX, FOST Concurrence, dated September 19, 2007
Mr. Chang does not sign his Concurrence statement it was signed by Michael Montgomery

It looks like James Chang concerns were overridden by his supervisor "Michael Montgomery Chief Federal Facilities and Site Cleanup Branch"

I have read several of Mr. Chang's reports I like him!
The AF beat-up anyone who stands up to them

From: Burke, NadiaHollan [mailto:Burke.NadiaHollan@epa.gov]
Sent: Friday, January 02, 2015 3:16 PM
To: Frank Vera
Cc: Aycock, Mary; Stone, Linda@Waterboards; Battey, Todd@Waterboards
Subject: RE: George AFB Family Housing - pesticides "solid waste" under RCRA Section 1004(27)

I assume you have seen the FOST for those properties (attached) AR#2461. Refer to Section 5.15 Pesticides, pages 11-14 re: AF vs. Regulatory position and land use control requirements at the time of property transfer.

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From: Frank Vera **Ex. 6 Personal Privacy (PP)**
Sent: Wednesday, December 31, 2014 8:56 PM
To: Stone, Linda@Waterboards; Joe Gardella
Cc: Aycock, Mary; Burke, NadiaHollan
Subject: George AFB Family Housing - pesticides "solid waste" under RCRA Section 1004(27)

The attachments are regarding the EPA's conclusion that pesticides can be classified as "solid waste" under RCRA Section 1004(27).

Unless I am misreading the documents, it appears to be the EPA's conclusion that the pesticides are no longer protected under "intended use" when the structures are demolished or are to be demolished. Because of this, the chemical's "intended use" is no longer applicable, and the pesticides become "solid waste" and subject to RCRA.

"EPA has named aldrin and dieldrin as hazardous solid waste materials. If quantities greater than 1 pound enter the environment, the National Response Center of the federal government must be told immediately."

<http://www.atsdr.cdc.gov/phs/phs.asp?id=315&tid=56#bookmark09>

- Considering the reported levels of aldrin and dieldrin at the George AFB's "Family Housing" and that these pesticides were used liberally base-wide for years, hasn't more than 1 pound been released into the environment at George AFB?
- Was the [National Response Center](#) notified by the AF of the release of aldrin and dieldrin?
- How did the AF dispose of the aldrin and dieldrin when the AF stopped using it?
- How much aldrin and dieldrin, and how, did the AF dispose of at George AFB?

When the AF stopped using DDT at George AFB they buried it.

KBs	Subject or Title	Author / Author Affiliation	Document Date	AR #
5,101	Phase I, Records Search Report, Vol I of II	CH2M Hill	01/01/1982	3

Page 29

"The use of DDT was discontinued in 1962."

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"although a large quantity of DDT was reportedly buried east of the present sewage percolation ponds."

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"Site No. 8—8 — located east of alert hangar and southeast of Site No. 5. An unverified report of DDT, copper sulfate, and leaded paint disposal in - this site was made."

Happy New Year!

I hope that this helps.

Frank Vera

Ex. 6 Personal Privacy (PP)

www.GeorgeAFB.Info